

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RICHARD DENNIS, SONTERRA CAPITAL MASTER FUND, LTD., FRONTPOINT FINANCIAL SERVICES FUND, L.P., FRONTPOINT ASIAN EVENT DRIVEN FUND, L.P., FRONTPOINT FINANCIAL HORIZONS FUND, L.P., AND ORANGE COUNTY EMPLOYEES RETIREMENT SYSTEM, on behalf of themselves and all others similarly situated,

Docket No. 16-cv-06496 (LAK)

Plaintiffs,

-against-

JPMORGAN CHASE & CO., JPMORGAN CHASE BANK, N.A., BNP PARIBAS, S.A., THE ROYAL BANK OF SCOTLAND GROUP PLC, THE ROYAL BANK OF SCOTLAND PLC, RBS N.V., RBS GROUP (AUSTRALIA) PTY LIMITED, UBS AG, AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD., COMMONWEALTH BANK OF AUSTRALIA, NATIONAL AUSTRALIA BANK LIMITED, WESTPAC BANKING CORPORATION, DEUTSCHE BANK AG, HSBC HOLDINGS PLC, HSBC BANK AUSTRALIA LIMITED, LLOYDS BANKING GROUP PLC, LLOYDS BANK PLC, MACQUARIE GROUP LTD., MACQUARIE BANK LTD., ROYAL BANK OF CANADA, RBC CAPITAL MARKETS LLC, MORGAN STANLEY, MORGAN STANLEY AUSTRALIA LIMITED, CREDIT SUISSE GROUP AG, CREDIT SUISSE AG, ICAP PLC, ICAP AUSTRALIA PTY LTD., TULLETT PREBON PLC, TULLETT PREBON (AUSTRALIA) PTY LTD., AND JOHN DOES NOS. 1-50.

Defendants.

**PLAINTIFFS' NOTICE OF MOTION FOR FINAL APPROVAL OF CLASS ACTION
SETTLEMENTS WITH DEFENDANTS JPMORGAN CHASE & CO. AND
JPMORGAN CHASE BANK, N.A., WESTPAC BANKING CORPORATION,
AUSTRALIA AND NEW ZEALAND BANKING GROUP LTD., COMMONWEALTH
BANK OF AUSTRALIA, NATIONAL AUSTRALIA BANK LIMITED, MORGAN
STANLEY AND MORGAN STANLEY AUSTRALIA LIMITED, CREDIT SUISSE AG
AND CREDIT SUISSE GROUP AG, BNP PARIBAS, S.A., DEUTSCHE BANK AG,
ROYAL BANK OF CANADA, THE ROYAL BANK OF SCOTLAND PLC, AND UBS AG**

PLEASE TAKE NOTICE that upon the accompanying memorandum of law, the Joint Declaration of Vincent Briganti and Christopher Lovell, the Declaration of Gina M. Ratto, and the exhibits attached thereto, and the record herein, Plaintiffs, by and through their undersigned counsel, will respectfully move this Court, before the Honorable Lewis A. Kaplan, United States District Judge, at the United States District Court, Southern District of New York, 500 Pearl Street, New York, New York on November 1, 2022 at 4:00 p.m. for an order granting final approval of the Settlements between Plaintiffs and Defendants JPMorgan Chase & Co. and JPMorgan Chase Bank, N.A., Westpac Banking Corporation, Australia and New Zealand Banking Group Ltd., Commonwealth Bank of Australia, National Australia Bank Limited, Morgan Stanley and Morgan Stanley Australia Limited, Credit Suisse AG and Credit Suisse Group AG, and BNP Paribas, S.A., Deutsche Bank AG, Royal Bank of Canada, The Royal Bank of Scotland plc (n/k/a NatWest Markets plc), and UBS AG, and for such other relief as set forth in the [Proposed] Final Approval Orders and the [Proposed] Final Judgments, filed herewith.

Dated: August 18, 2022

LOWEY DANNENBERG, P.C.

By: /s/ Vincent Briganti
Vincent Briganti
Geoffrey M. Horn
44 South Broadway, Suite 1100
White Plains, New York 10601
Tel.: 914-997-0500
Fax: 914-997-0035
vbriganti@lowey.com
ghorn@lowey.com

LOVELL STEWART HALEBIAN JACOBSON LLP

By: /s/ Christopher McGrath
Christopher Lovell
Christopher McGrath
500 Fifth Avenue, Suite 2440
New York, NY 10110
Tel: (212) 608-1900

clovell@lshllp.com
cmcgrath@lshllp.com

Counsel for Plaintiffs and the Proposed Class

Todd Seaver
Carl N. Hammarskjold
BERMAN TABACCO
425 California Street, Suite 2300
San Francisco, CA 94104
Tel.: (415) 433-3200
Fax: (415) 433-6382
tseaver@bermantabacco.com
chammarskjold@bermantabacco.com

Patrick T. Egan (PE-6812)
BERMAN TABACCO
One Liberty Square
Boston, MA 02109
Tel.: (617) 542-8300
Fax: (617) 542-1194
pegan@bermantabacco.com

*Additional Plaintiffs' Counsel for Orange County
Employees Retirement System*